

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**PETITION FOR WRIT OF
HABEAS CORPUS AD PROSEQUENDUM**

Your petitioner, the United States of America, by its attorney, Christopher J. Burke, Assistant United States Attorney, with the knowledge and consent of Colm Connolly, United States Attorney for the District of Delaware, respectfully shows:

1. The defendant, who has been indicted for a violation of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm), is scheduled for an initial appearance before this Court on August 3, 2006, at 1:00 p.m.

2. The defendant is currently being held pending trial on related State charges at the Howard K. Young Correctional Center (Gander Hill) in Wilmington, and, therefore, must be written out before this Court can conduct the initial appearance.

WHEREFORE, petitioner prays that the Clerk of the Court be instructed to issue a writ of habeas corpus ad prosequendum to the Warden of the Howard K. Young Correctional Center (Gander Hill) and to the United States Marshal for the District of Delaware to deliver

Lionel Bell to the office of the United States Marshal on August 3, 2006, at 1:00 p.m., with the defendant being held in federal custody until the federal charges are resolved.

COLM CONNOLLY
United States Attorney

BY: /s/
Christopher J. Burke
Assistant United States Attorney

Dated: July 12, 2006

IT IS SO ORDERED this _____ day of _____, 2006.

Honorable Mary Pat Thyng
United States Magistrate Judge